

# DICKSTEINSHAPIRO<sub>LLP</sub>

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February 24, 2009

## By Electronic Filing

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., TW-A325  
Washington, DC 20554

**Re: EB Docket No. 06-36**

Dear Ms. Dortch:

Please find enclosed a copy of the 2009 CPNI compliance certification of Fones West Digital Systems, Inc., Form 499 Filer ID # 823796.

Please contact the undersigned if you have any questions about this filing.

Sincerely,



Robert F. Aldrich

Enclosure

cc: Best Copy and Printing, Inc.

Annual 64.2009(e) CPNI Certification for: Calendar Year 2008  
Date Filed: February 24 2008  
Name of Company covered by this certification: Fones West Digital Systems, Inc.  
Form 499 Filer ID: 823796  
Name of Signatory: Kevin Lee  
Title of Signatory: Vice President

I, Kevin Lee, certify and state that:

1. I am Vice President of Fones West Digital Systems, Inc. ("Fones West") and, acting as an agent of the company, I have personal knowledge of Fones West's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Fones West's operating procedures are adequate to ensure compliance with the CPNI requirements of Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR, Subpart U.
3. Attached to this certification as Attachment A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.



Kevin Lee  
Fones West Digital Systems, Inc.

02-24-2009  
Date

Attachment A  
Statement of CPNI Procedures and Compliance

**Fones West Digital Systems, Inc.**

Calendar Year 2008

**Fones West Digital Systems, Inc.****Statement of CPNI Procedures and Compliance**

Fones West Digital Systems, Inc. ("Fones West" or "Company") is a very small business (fewer than five employees). Fones West provides paging services to individuals and businesses.

Fones West does not use or disclose customer proprietary network information ("CPNI") for any purpose other than the provision and billing of its services. If the Company elects to use CPNI in a manner that requires customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Call detail information is not provided over the telephone to customers. If a customer requests call detail information, it is sent to the e-mail or U.S. mail address of record previously provided by the customer.

Customers do not have on-line access to their CPNI. The Company does not have any retail locations and therefore does not disclose CPNI at in-store locations.

Fones West trains those employees who have access to CPNI in the importance of protecting customer data.

The Company notifies law enforcement of a breach of a customer's CPNI within seven (7) business days, and notifies customers of the breach. The Company maintains a record of all such breaches and notifications and updates the customer's record with information regarding such notifications.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release of CPNI or call records in calendar year 2008.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call records.